

SEABOARD GROUP II AND CITY OF HIGH POINT

30 PURGATORY ROAD
MONT VERNON, NH 03057

April 13, 2011

Mr. Vance Jackson, P.G.
North Carolina Department of Environment and Natural Resources
Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605

Re: Quarterly Remedial Action Construction Progress Report, 1st Quarter 2011 Seaboard Chemical Corp. and Riverdale Drive Landfill Site, Jamestown, North Carolina

Dear Mr. Jackson:

Seaboard Group II and the City of High Point (herein the Parties) are providing the 2011 1st Quarter Remedial Action Construction Progress Report for the former Seaboard Chemical Corporation and closed Riverdale Drive Landfill Site. The Remedial Action Pre-Construction Report for the mechanical treatment systems was submitted to North Carolina Department of Environment and Natural Resources (NCDENR) on December 28, 2009. The report was subsequently approved by NCDENR, Division of Waste Management (NCDWM) on March 22, 2010. Although the Natural Treatment Systems Remedial Action Pre-Construction Report has not been approved by NCDWM, it was submitted on October 25, 2010 and the Parties have elected to include comments on those activities with this report.

Summary of Remedial Construction Work Performed – 1st Quarter 2010

The activities conducted in the 1st Quarter of 2011 involved planning and preparation for remedial construction as well as some field construction activities. The following construction-related activities were performed:

NIS Relocation work

- Replanted areas damaged in blasting incident.
- Completed design of NIS leachate collection sump.

Concrete Pad Foundations

- Revised drawings and specifications for concrete pad.
- Submitted design to structural engineer for review and certification
- Selected engineering firm to oversee concrete pad installation.
- Began clearing activities for pad areas.

Physical Treatment System

- Vendor of the AO+ system (Purifics ES, Inc.) notified the Parties of construction delays during the 4th quarter of 2010. The main system was ordered on April 28, 2010 (metals removal, air stripper and advanced oxidation system (AO+)) as

specified in the bid documents and delivery was estimated to be 26 weeks from approval of drawings. Due to equipment vendor delays in shipping components to Purifics, the delivery has been delayed until end of May 2011 for the treatment system components.

- Vendor initiated in-shop fabrication of the integrated treatment system as specified in the bid documents (approximately 50% complete at end of period)

Lift Stations (LS-1, LS-2 and LS-3)

- Lift Stations 1 and 2 were ordered on August 18, 2010. Fabrication is approximately 70% complete as of the date of this report. Delivery is planned for the end of April or early May 2011.
- Vendor initiated construction of LS-1 and LS-2 as specified in the bid documents (approximately 70% complete at end of period).
- Lift Station 3 was placed on hold as it is under consideration for elimination from the treatment process.

Groundwater and Leachate Recovery Pumps

- Contractor purchased groundwater and leachate pneumatic recovery pumps as specified in the bid documents. The purchased order was issued on September 8, 2010 and the work completed in December 2010 with the exception of installing the NIS leachate collection sump and final installation of the recovery pumps. The pumps will be installed after the system is setup to avoid the possibility of damage prior to completion of construction activities.
- The Parties submitted a Technical Memorandum dated January 4, 2011 identifying the monitoring wells located at the Site that are no longer necessary, and requested permission to plug and abandon them. DENR verbally approved the well abandonment in March 2011.

Natural Treatment Systems

- On October 25, 2010, the Parties submitted the Pre-construction Report for the natural treatment system that included a report on the results of the 2009 – 2010 1,4-Dioxane pilot study. As a result of the data collected during that study it was determined that the phytoremediation system was capable of degrading the chlorinated volatile organic compounds contained in the groundwater and leachate. The Parties examined the feasibility of eliminating the constructed treatment wetlands (CTW) from the natural treatment system as a result of those findings and determined that it was feasible. As a result, they submitted a Technical Memorandum requesting that DENR approve the elimination of the CTW from the initial construction phase of the project. The parties are awaiting approval of that Technical Memorandum.

- Continued to refine the specifications for the phytoremediation control and instrumentation system to eliminate spread spectrum radio transmission of data, and the inherent difficulties that presents, from the system. The modified system will provide for hard wiring of data transmission using fiber optics. Ordered all of the necessary probes for soil moisture, salinity and temperature detection at three elevations (upper 12", middle level of cap, and soil/waste interface) at 23 selected locations (total of 69 probes). Ordered the wind speed and direction instrument, the temperature and relative humidity instrument, the rain gauge, and the solar radiation instrumentation for the weather station used for the calculation of evapotranspiration used in the control system.

The Parties continue to monitor for the possibility that there may be an additional delay in the fabrication of the Mechanical Treatment System and Lift Stations, or in obtaining the requisite building permits to install the treatment structures. The mechanical treatment system vendor (Purifics) indicated earlier there had been a delay in acquiring all the necessary parts for the system. As such, the Parties submitted a Technical Memorandum requesting an extension of the March 22, 2011 mechanical system construction deadline. The extension requested that the deadline for completion of the construction of the mechanical treatment system be extended until July 31, 2011. The extension was verbally approved by DENR in March.

Remedial Construction Work Remaining

The following construction activities remain to complete the implementation of the remedy:

NIS Relocation

- Prepare as-built drawings documenting work performed. (Q2 2011)

Concrete Pad Foundations

- Complete necessary structural engineers certification. (Q2 2011)
- Complete necessary electrical engineers certification (Q2 2011)
- Obtain necessary building permits prior to initiating site work (Q2 2011).
- Clear the areas for the concrete pads. (Q2 2011)
- Pour the pads for LS-1, LS-2 and the Purifics equipment (Q2 2011)

Physical Treatment System

- Purifics to continue in-shop fabrication of the integrated treatment system as specified in the bid documents (Q1 and Q2 2011)
- Shop testing and delivery of treatment system to site (Q2 2011)
- On-site electrical and mechanical hook-ups (Q2 and Q3 2011)
- On-site testing of treatment system (Q3 Q4 2011 and Q1 2012)

Lift Stations (LS-1, LS-2)

- Vendor to build LS-1, and LS-2 as specified in the bid documents (Q1 and Q2 2011)
- Shop testing and delivery of LS-1 and LS-2 to site (Q2 2011)
- On-site electrical and mechanical hook-ups for LS-1 and LS-2 (Q2 and Q3 2011)
- On-site testing of LS-1 and LS-2 (Q3 Q4 2011 and Q1 2012)

Groundwater and Leachate Recovery Pumps

- On-site electrical and mechanical hook-ups (Q2 and Q3 2011)
- On-site testing of pumps (Q3 and Q4 2011)

NIS Leachate Collection System

- Install Leachate Collection Sump. (Q2 and Q3 2011)
- On-site electrical and mechanical hook-ups (Q3 2011)
- On-site testing (Q3 2011)

Soil Residue Mound

- Clear area for soil residue mound improvements (Q1 and Q2 2011)
- Re-grade soil cap on soil residue mound (Q2 2011)
- Install cover liner and geotextile on soil residue mound (Q2 2011)

Natural Treatment Systems

- Finalize design of control and instrumentation system. (Q2 2011)
- Install soil sensors and weather station (Q2 and Q3 2011)
- On-site testing of soil moisture control system

Cedrow Park Buffer Impact Mitigation Project

- Install fence (Q2 2011)
- Complete all work (Q2 2011)

Crutchfield Land Use Restrictions

- The Parties have been notified by the landowners across the river from the site, the Crutchfields, that they will not allow the filing of land use restrictions on their property. The Parties have notified DENR of this refusal and proposed that, with the restrictions placed on the land use by the Piedmont Triad Water Authority buffer and Guilford County Health Department rules, the land use restrictions are unnecessary. As a result the Parties submitted a Technical Memorandum requesting that the requirement be eliminated from the scope of work. That request is being evaluated by DENR.

If you have any questions, or if we may be of any assistance, please contact Gary Babb (919-325-0696) or Jim LaRue (281-431-3571). Please direct correspondence related to this matter to:

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Communications via electronic mail should be directed to gbabb@nc.rr.com and jlarue@swenv.com.

Respectfully,

Seaboard Group II and City of High Point

A handwritten signature in dark ink, appearing to read 'James C. LaRue', with a stylized, cursive script.

James C. LaRue
Oversight Consultant – Seaboard Group II

cc Gary Babb
Chris Thompson
Randy Smith
Jackie Drummond
Dave Roberson